

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TENNESSEE
EASTERN DIVISION**

IN RE:

CHAPTER 7 CASE NO.

**BRADLEY G. FRYE
KIMBERLY D. FRYE**

13-10727

DEBTORS

MOTION FILED BY DEBTORS TO ENLARGE TIME FOR FILING OF
REAFFIRMATION AGREEMENT

The Debtors, through counsel of record, respectfully move the Court for an Order to Extend Time for Filing of Reaffirmation Agreement:

1. The Debtors filed their Chapter 7 petition on March 22, 2013.
2. The Debtors wish to reaffirm the debt owed to Ally Financial for the 2012 Mitsubishi Lancer.
3. The Debtors have executed a Reaffirmation Agreement with Ally Financial but it has not been filed with the Court.
4. The Debtors are requesting that the Court grant them an additional thirty (30) days to file the Reaffirmation Agreement with Ally Financial.

WHEREFORE, PREMISES CONSIDERED, Debtors pray that an order be entered enlarging time for the filing of the Reaffirmation Agreements by an additional thirty (30) days so that the Reaffirmation Agreement with Ally Financial may be filed with the Court prior to discharge.

RESPECTFULLY SUBMITTED

/s/ T. Verner Smith
T. Verner Smith #11686
Attorney for the Debtor(s)
PO Box 1743, Jackson, TN 38302-1743
731-423-1888

CERTIFICATE OF SERVICE

The undersigned party, Attorney for party, or agent therefore, hereby certifies that on this 25th day of June, 2013, copies of the documents identified below were served by mail, served electronically or served via hand delivery to the parties listed:

A Motion to Enlarge Time for Filing a Reaffirmation Agreement filed by Debtor Counsel on June 25, 2013.

/s/ T. Verner Smith
Law Office of T. Verner Smith
112 N. Liberty
P.O. Box 1743
Jackson, TN 38302

T. Verner Smith
P.O. Box 1743
Jackson, TN 38302

Marianna Williams
Chapter 7 Trustee
P.O. Box H
Dyersburg, TN 38025

Bradley & Kimberly Frye
100 Stone Road
Pinson, TN 38366

Matrix

